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June 9, 2017

VIA ECF

The Honorable Robert M. Levy, U.S.M.J.
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Purcell v. Gallina Meat Corp.*
Case No.: 1:16-cv-02066-PKC-RML

Dear Magistrate Judge Levy:

We represent defendant Gallina Meat Corp. d/b/a Ideal Foods (“Gallina”) in the above-referenced case. We write to update the Court on the status of the parties’ settlement and to respectfully request, with plaintiff’s consent, that the June 13, 2017 telephone conference be cancelled and that this case be marked off the Court’s calendar, with thirty (30) days’ leave to restore.

The bases of the parties’ requests are as follows: (1) the parties have agreed upon the terms of a formal written settlement agreement, (2) that settlement agreement has been executed on behalf of Gallina and dispatched to plaintiff’s counsel for execution by plaintiff, and (3) our law firm is in possession of a fully executed stipulation of dismissal with prejudice pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure. Under the parties’ agreement, we are obligated to hold the stipulation of dismissal in escrow until certain remaining settlement conditions are satisfied. Once those conditions are satisfied, we are authorized to proceed to file the stipulation of dismissal with the Court without further notice.

The parties greatly appreciate the Court’s continuing attention to and patience with this matter in allowing the parties to reach an amicable resolution without the need for further intervention.

Respectfully submitted,

David Grech

David J. Grech

cc: All Attorneys of Record (*via ECF*)